REGULATION OF FIRMS BULLETIN: PERMIT TO PRACTICE NUMBER USAGE

DATE OF BULLETIN | February 16, 2023

BULLETIN

Effective October 1, 2021, all firms that engage in the practice of professional engineering or geoscience are required to have a Permit to Practice issued by Engineers and Geoscientists BC.

All firms issued a Permit to Practice will receive a seven-digit Permit to Practice number that provides proof of registration with Engineers and Geoscientists BC. Beginning October 1, 2021, this number must be applied to all authenticated documents issued on behalf of the firm. 

Authenticated documents lacking a Permit to Practice number are in contravention of Bylaw 7.3.7(14) and may be rejected by the receiving party.

Engineers and Geoscientists BC does not supply nor sell any stamps associated with Permit to Practice numbers.

Applying a Permit to Practice Number

The Permit to Practice number may only be applied to a document by:

1. a Responsible Registrant of the firm; or
2. an individual employed by or under contract with the firm who is authorized to apply the Permit to Practice number in accordance with the firm’s Professional Practice Management Plan (PPMP). These authorizations must be contained in documented policies and procedures.

Documenting Permit to Practice Number Usage: Policies and Procedures

After receiving their Permit to Practice for the first time, firms have 12 months to document the required policies and procedures in a PPMP. Prior to this time, firms can implement interim policies and procedures which will later be incorporated into or superseded by the PPMP.

With respect to the Permit to Practice number, the PPMP and any interim policies or procedures should address:

1. Who is authorized to apply the Permit to Practice number. Depending on the size, complexity and business of the firm, it may make sense for only the Responsible Registrant(s) to apply the Permit to Practice number, or for other registrants employed by or under contract with the firm to be authorized to apply the Permit to Practice number to
documents they authenticate on behalf of the firm. For practical reasons, some firms may also authorize non-registrant individuals employed by or under contract with the firm to apply the Permit to Practice number to documents, keeping in mind that only registrants are allowed to authenticate documents (as per Bylaw 7.3.7(4)).

2. **When the Permit to Practice number should be applied.** Firms must apply the Permit to Practice number to all authenticated documents (as per Bylaw 7.3.7(14)). Firms may also choose to apply the Permit to Practice number to additional identified categories of documents that do not require authentication (e.g., documents originating in a specific office, department, or area of practice).

3. **How the Permit to Practice number should be applied.** A Permit to Practice number may be applied by type, handwriting, electronic means, rubber stamp or any other method that results in a visible and legible Permit to Practice number on the document. The Permit to Practice number may be prepopulated on template documents (e.g., in title blocks or in the block where a registrant will apply their individual seal) if the Responsible Registrant(s) or authorized individuals’ control or have final approval of the template documents.

When developing the PPMP or interim policies and procedures, Responsible Registrants should review Bylaw 7.3.7, Standard for Issuance of Manual Seal, Authenticating Documents, and Use of Permit to Practice Number and the text of Bylaw Schedule D, Responsible Registrant Declaration.

Engineers and Geoscientists BC has also published a Practice Advisory for Permit to Practice Requirements for Letters of Assurance.

The core requirement, effective on and from October 1, 2021, is that firms must apply their Permit to Practice number to all authenticated documents. Authenticated documents lacking a Permit to Practice number are in contravention of Bylaw 7.3.7(14) and may be rejected by the receiving party.

**ABOUT REGULATION OF FIRMS BULLETINS**

These bulletins are intended to address emergent or novel topics in a timely manner. Each bulletin provides Engineers and Geoscientists BC’s interpretation of how registrants and firms should approach the topic. The contents of the bulletins will be incorporated into broader Regulation of Firms guidance documents as those documents are revised.